

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP
2 Charles K. Verhoeven (Bar No. 170151)
3 charlesverhoeven@quinnemanuel.com
4 Melissa Baily (Bar No. 237649)
5 melissabaily@quinnemanuel.com
6 James Judah (Bar No. 257112)
7 jamesjudah@quinnemanuel.com
8 Lindsay Cooper (Bar No. 287125)
9 lindsaycooper@quinnemanuel.com
10 50 California Street, 22nd Floor
11 San Francisco, California 94111-4788
12 Telephone: (415) 875-6600
13 Facsimile: (415) 875-6700

14 Marc Kaplan (*pro hac vice*)
15 marckaplan@quinnemanuel.com
16 191 N. Wacker Drive, Ste 2700
17 Chicago, Illinois 60606
18 Telephone: (312) 705-7400
19 Facsimile: (312) 705-7401

20 *Attorneys for Google LLC*

21 UNITED STATES DISTRICT COURT
22
23 NORTHERN DISTRICT OF CALIFORNIA
24
25 SAN FRANCISCO DIVISION

26 GOOGLE LLC,

27 Plaintiff,

28 vs.

SONOS, INC.,

Defendant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S REVISED
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO THE
COURT'S OMNIBUS ORDER RE
MOTIONS TO SEAL (DKT. 518)**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Revised Administrative Motion to File
 7 Under Seal Pursuant to the Court’s Omnibus Order Re Motions to Seal (Dkt. 518). If called as a
 8 witness, I could and would testify competently to the information contained herein.

9 3. Google requests an order granting leave to file under seal the portions of the documents
 10 listed below that the Court declined to seal without prejudice:

Dkt.	Document	Portions Google Originally Sought to File Under Seal	Portions Google Now Seeks to File Under Seal	Designating Party
Dkt. 210-3	Exhibit 1	Entire document (Dkt. 210)	Portions outlined in blue boxes	Google
Dkt. 252-3 / Dkt. 263-1	Exhibit 1	Portions outlined in red boxes (Dkt. 262)	Portions outlined in blue boxes	Google

16
 17 4. Google also respectfully requests an order granting leave to keep under seal the
 18 portions of the documents listed below that the Court declined to seal, but that contain references to
 19 highly confidential source code for Google’s products:

Dkt.	Document	Portions Google Originally Sought to File Under Seal	Portions Google Now Seeks to File Under Seal	Designating Party
Dkt. 209-4	Exhibit B	Portions outlined in red boxes (Dkt. 215)	Portions outlined in blue boxes on page 10	Google
Dkt. 247-3	Google’s Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Pursuant to the Court’s Patent Showdown Procedure	Portions highlighted in yellow and green; portions outlined in red boxes (Dkt. 247)	Portion outlined in blue box on page 10	Google
Dkt. 252-2	Sonos’s Opposition to Google’s Motion	Portions highlighted in green	Portions outlined in blue boxes on	Google

1	for Summary Judgment Pursuant to the Court's Patent Showdown Procedure	(Dkt. 262)	page 2	
2	Dkt. 276-4 / Dkt. 277- 3	Exhibit 1	Portions highlighted in yellow (Dkt. 276)	Portions outlined in blue boxes on page 4

5. The portions of Dkts. 210-3, 252-3, 209-4, 247-3, 252-2, and 276-4 outlined in blue
6 boxes contain references to highly confidential source code for Google's products that Google does
7 not share publicly. The disclosure of such source code would harm the competitive standing that
8 Google has earned through years of innovation by allowing Google's competitors to benefit from
9 Google's investments in research and development and by revealing Google's trade secrets and
10 sensitive aspects of its proprietary systems and designs, to Google's competitors. I understand that
11 this Court and other courts in the Northern District of California have sealed similar source code
12 references. *See, e.g.*, Dkt. 518 at 6, 8, 12, 13; *see also In re Koninklijke Philips Pat. Litig.*, No. 18-
13 CV-01885-HSG, 2020 WL 1865294, at *2 (N.D. Cal. Apr. 13, 2020); *X One, Inc. v. Uber Techs., Inc.*,
14 No. 16-CV-06050-LHK, 2020 WL 718310, at *3 (N.D. Cal. Feb. 12, 2020).

16 I declare under penalty of perjury under the laws of the United States of America that to the
17 best of my knowledge the foregoing is true and correct. Executed on March 8, 2023, in San
18 Francisco, California.

19 DATED: March 8, 2023

20 By: /s/ Jocelyn Ma
21 Jocelyn Ma

1 **ATTESTATION**

2 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the
3 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred
4 in the aforementioned filing.

5
6 DATED: March 8, 2023

7 */s/ Charles K. Verhoeven*
8 Charles K. Verhoeven

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28